

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT GREENEVILLE**

UNITED STATES OF AMERICA)	
)	
v.)	No. 2:09-CR-74
)	JUDGE GREER
SAMANTHA JO ARWOOD)	

MOTION FOR BOND

Samantha Jo Arwood, by counsel, moves the Court to release her to an inpatient residential treatment facility pending the supervised release revocation hearing which has been cancelled and not yet rescheduled in light of COVID19 pandemic. In support of this motion, defendant states and shows as follows:

1. Ms. Arwood has been accepted into the residential treatment program at Comprehensive Community Services (CCS) in Kingsport, Tennessee, via a grant bed availability on April 28, 2020, at 9:00 a.m.

2. Defense counsel has informed U.S. Probation Officer Cara Johns of Ms. Arwood's acceptance into the treatment program. Counsel has conferred with both Officer Johns and AUSA Robert Reeves. The parties are in agreement that the appropriate course of action in this case is to release Ms. Arwood to the inpatient treatment program pending the revocation hearing. The parties intend to ask the district court to hold the revocation proceedings in abeyance pending her participation in the rehabilitation program.

3. Defense counsel requests the Court to release Ms. Arwood to CCS so that she may begin receiving treatment now as opposed to later. Counsel asks the Court to enter an order allowing her pretrial release requiring her continued compliance with all conditions previously set as well as her completion of the treatment program at CCS.

In consideration of the foregoing, defense counsel asks the Court to enter an order allowing Ms. Arwood's pretrial release with conditions as set forth above. She requests that a hearing, if necessary, be scheduled via videoconferencing at which time she can demonstrate by clear and convincing evidence that she is not a danger to the community or a risk of flight if allowed to address her addiction issues through an inpatient treatment program at CCS.

RESPECTFULLY SUBMITTED:

FEDERAL DEFENDER SERVICES OF
EASTERN TENNESSEE, INC.

BY: s/ Nikki C. Pierce
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CERTIFICATE OF SERVICE

I hereby certify that on April 23, 2020, a copy of the foregoing Motion for Bond was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

s/ Nikki C. Pierce